1 | FRANK BELL, CSBN 038955
A Law Corporation
2 | 333 Bradford Street, Suite 270
Redwood City, CA 94063
3 | Tel: 650 365-8300
Fax: 650 366-8987
4 | Email: FrankBell@FrankBellLaw.com

5 | Attorney for Defendant
RONNELL DUNN

6

7

8   UNITED STATES DISTRICT COURT

9   NORTHERN DISTRICT OF CALIFORNIA

                   SAN FRANCISCO DIVISION
10

11 | UNITED STATES OF AMERICA,   ) Case No: CR 13-00287 JST
)
12 | Plaintiff,   )
)
13 |) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONTINUE HEARING**
14 | vs.   )
)
15 | RONNELL DUNN,   )
)
16 |)
)
17 | Defendant.   )
     _____   )
18

19   The parties hereto have been engaged in discussions

20 | with regard to the settlement of this matter. However,

21 | they have not yet reached agreement. The parties

22 | believe that additional time will be helpful in a

23 | resolution of the matter to the satisfaction of each

24 | party.

25

STIP AND [PROPOSED] ORDER TO CONTINUE HEARING   1

1   WHEREFORE, the parties hereby stipulate that the

2   matter of RONNELL DUNN may be continued for

3   approximately thirty days to a new date convenient with

4

5   the court and counsel, which is suggested to be April

6   25, 2014 at 9:30 a.m. *The Court will set a trial date*

7   *at That time.*
    The parties further stipulate and agree that the

8   exclusion of time under the Speedy Trial Act, 18 U.S.C

9

10 3161, is called for because the requested continuance

11 is needed to allow counsel sufficient time to prepare

12 and that the failure to grant the continuance requested

13

14 would unreasonably deny counsel the time necessary for

15 effective preparation, taking into account the exercise

16 of due diligence.

17 Dated: March 19, 2014   __/s/ *Frank Bell* _____
18   FRANK BELL
                                  Attorney for Defendant
19   RONNELL DUNN
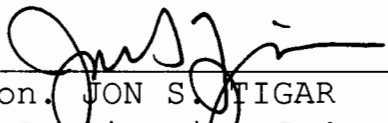
20

21 Dated: March 19, 2014   _/s/_*Acadia Senese*_____
22   ACADIA SENESE
                                  Asst. U.S. Attorney
23

24

25

STIP AND [PROPOSED] ORDER TO CONTINUE HEARING   2

1   [PROPOSED] ORDER

2   On the stipulation of the parties and good cause

3   appearing:

4

5   IT IS HEREBY ORDERED that the matter before the

6   court on March 28, 2014 is continued to April 25, 2014

7   at 9:30 a.m. for further status.

8

9   Dated: 3/25/14

10   _____
                                    Hon. JON S. TIGAR
11   U.S. District Judge

12

13

14

15

16

17

18

19

20

21

22

23

24

25